

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

JUL 17 2013

U. S. DISTRICT COURT  
E. DIST. OF MO.  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SEAN ALAN HOLLAND,

Defendant.

No.  
4 : 13 CR 00299 CDP

**INDICTMENT**

**COUNT I (Wire Fraud)**

The Grand Jury charges that:

1. Between approximately January 1, 2008 and December 31, 2010, Defendant Sean Alan Holland worked as the bookkeeper for the Maryland House Condominium Association ("Maryland House"), which is an entity located in and doing business from the City of St. Louis within the Eastern District of Missouri. Holland's responsibilities at the company included paying bills by means of company checks and balancing company financial accounts.

2. At some point unknown to the Grand Jury but by at least March 10, 2008 through December 22, 2010, the defendant devised a scheme and artifice to defraud and to obtain money from the association by means of false or fraudulent pretenses, representations or promises and, for purposes of executing this scheme, did send or cause to be sent wire communications in interstate commerce, as follows:

a. It was part of the scheme and artifice that the defendant transferred by means of interstate wire communications in excess of fifty wire transfers of funds from a Maryland House

financial account to which he had access through his position with Maryland House to his personal bank account. These transfers were in addition to the regular checks he wrote to himself as compensation for services Defendant rendered to Maryland House.

b. It was further part of the scheme and artifice that the defendant did not present either the aforementioned wire transfers or the aforementioned checks he prepared and executed for his benefit to a member of the Maryland House board or any other authorized agent of Maryland House. In contrast, checks and payments Defendant prepared for other vendors or employees of Maryland House were presented to an authorized party for his or her signature and approval.

c. It was further part of the scheme and artifice that the defendant concealed the aforementioned unauthorized checks and wire transfers from the Board and management of Maryland House by failing to properly record, characterize and present these payments to the Board and management as he did other expenses. In all, in addition to checks paid for services rendered to Maryland House, Defendant received in excess of \$70,000 in Maryland House funds by means of these secret, unauthorized wire transfers he directed to his personal bank account.

4. On or about November 9, 2010, in the Eastern District of Missouri, for the purpose of executing the foregoing scheme and artifice to defraud and to obtain money or property and attempting to do so,

**SEAN ALAN HOLLAND,**

the defendant herein, did knowingly and willfully cause a wire communication to be sent in interstate commerce, to wit: a wire transfer in the amount of \$2,300 from a Maryland House financial account to Defendant's personal bank account.

In violation of Title 18, United States Code, Section 1343.

A TRUE BILL

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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THOMAS C. ALBUS, 46224MO  
Assistant United States Attorney